

Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Further Submission in support of, or opposition to, a notified proposed plan change or variation

Clause 8 of Schedule 1, Resource Management Act 1991
FORM 6



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Jo Horrocks

Organisation Name (if further submission is made on behalf of Organisation)

Toka Tū Ake EQC

Address for service of Further Submitter

Telephone: Fax/Email:

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (or opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number

Plan Change/Variation Name

I Oppose Part of the submission of:

(Original Submitters Name and Address)

Kāinga Ora – Homes and Communities

PO Box 74598, Greenlane, Auckland 1051.
Email: developmentplanning@kaingaora.govt.nz

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

873	1
	2
	3
	6 to 19
	21
	28
	32
	51
	52
	73
	76
	83 to 375, 379 to 383, 385 to 387

The reasons for my opposition are:

873.1 – OPPOSE

This part of the submission proposes that the Residential – Single House zone is deleted entirely and rezoned with Residential – Mixed Housing Urban zone, which allows for up to three dwellings per site. Areas currently zoned as Residential – Single House include smaller coastal settlements like Omana Beach, Omaha Beach, and Snells Beach, which are at risk from coastal hazards such as storm surges, tsunami and coastal erosion, and inland settlements like Kumeū which have experienced severe flooding in the recent past¹. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future.

873.2 – OPPOSE

This submission proposes that the Residential – Low Density zone is deleted entirely and rezoned with Residential – Mixed Housing Urban zone, which allows for up to three dwellings per site. Areas currently zoned as Residential – Low Density include parts of suburbs which are at risk from natural hazards. In particular, the Residential - Low Density zone incorporates some of those properties which are within the Coastal Erosion and Coastal Inundation hazard overlays, and some properties at particular risk of flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding being rezoned as Residential – Low Density, in order to limit the exposure of residents and their property to natural hazards.

873.6 to 873.19 – OPPOSE IN PART

These parts of the submissions propose increasing the spatial extent and allowed heights of the Residential – Terrace Housing and Apartment Buildings zone around business and metropolitan centres. While Toka Tū Ake EQC understands the need for residential intensification, we do not support blanket application of intensification without regards to areas at risk of natural hazards. Toka Tū Ake EQC opposes rezoning for higher density or increasing building height limits in areas which are at risk from natural hazard, particularly those properties within the Coastal Erosion or Coastal Inundation Hazard zones, or in areas at within the Flood Hazard overlays.

873.28 – OPPOSE IN PART

This part of the submission proposes that qualifying matters are applied by overlays rather than zones or precincts, except in the case of flood hazards. Toka Tū Ake EQC supports the use of regulatory overlays in the application of qualifying matters to limit intensification in areas at risk from natural hazards, as long as flood hazard maps are included. Floods are one of the most frequent hazards faced in Aotearoa and can have serious effects on wellbeing if flooding events are severe or repeated. Controlling development via flooding overlays is consistent with other applications of natural hazard qualifying matters and accurate and risk-based regulatory hazard maps are an important tool to limit subdivision and development within areas subject to natural hazard risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.

¹ <https://www.nzherald.co.nz/nz/west-auckland-flooding-incredible-photos-as-kumeu-experiences-second-wettest-day-on-record/6BEAX3LGS2X3JKSEVOZ7QFFCGQ/>

873.32 – OPPOSE

This part of the submission proposes that all references to Residential – Low Density zone are deleted. Areas currently zoned as Residential – Low Density include parts of suburbs which are at risk from natural hazards. In particular, the Residential - Low Density zone incorporates some of those properties which are within the Coastal Erosion and Coastal Inundation hazard overlays, and some properties at particular risk of flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding being rezoned as Residential – Low Density, in order to limit the exposure of residents and their property to natural hazards.

873.51 – OPPOSE

This part of the submission proposes that down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. This includes Residential – Low Density zone being deleted entirely and rezoned with Residential – Mixed Housing Urban zone, which allows for up to three dwellings per site. Areas currently zoned as Residential – Low Density include parts of suburbs which are at risk from natural hazards. In particular, the Residential - Low Density zone incorporates some of those properties which are within the Coastal Erosion and Coastal Inundation hazard overlays, and some properties at particular risk of flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density, in order to limit the exposure of residents and their property to natural hazards

873.52 – OPPOSE

This part of the submission proposes that flood hazard mapping is deleted from the Auckland Unitary Plan. Floods are one of the most frequent hazards faced in Aotearoa and can have serious effects on wellbeing if flooding events are severe or repeated. Controlling development via flooding overlays is consistent with other applications of natural hazard qualifying matters and accurate and risk-based regulatory hazard maps are an important tool to limit subdivision and development within areas subject to flooding risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk. As per our original submission, Toka Tū Ake EQC requests that areas of higher flooding hazard risk, i.e. stream corridors, overland flowpaths and ponding areas are included within the regulatory maps in the district plans.

873.83 to 873.375, 873.379 to 873.383, 873.385 to 873.387 – OPPOSE IN PART

These parts of the submission propose either the rezoning of various areas from lower density zones (Residential – Single House and Residential – Low Density), to higher density zones (Residential – Mixed Urban or Residential – Terrace Housing and Apartment Buildings), or inserting height restriction zones which increase the allowed height for buildings in this area. Toka Tū Ake EQC opposes rezoning for higher density or increasing building height limits in areas which are at risk from natural hazards, particularly those properties within the Coastal Erosion or Coastal Inundation Hazard zones, or in areas at risk from flooding hazards. Natural hazards, particularly coastal erosion and flooding, are already impacting suburbs of Auckland on a regular basis, and the risks from these will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change.

I seek that the parts of the original submission outlined above be disallowed

I support : Oppose (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

Russel Property Group

Vijay.lala@tattico.co.nz

839	7
	8

The reasons for my opposition are:

839.7 – OPPOSE

This submission proposes deleting natural hazards as qualifying matters in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, landslides, coastal inundation and flooding, which will likely become more severe in the near future due to the effect of climate change.

839.8 – OPPOSE

This part of the submission proposes deleting the part of the background to the Natural Hazards chapter introducing natural hazards as qualifying matters in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

I seek that the parts of the original submission outlined above be disallowed

I support : Oppose (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

Villages of New Zealand Limited

Tom.Morgan@Tattico.co.nz

841	3
	5
	7
	8
	10
	61
	113
	114
	115

The reasons for my opposition are:

841.3 – OPPOSE

This part of the submission proposes removing “unjustified” qualifying matters in the Unitary Plan. The submission does not define which qualifying matters they consider “unjustified”, so we assume this could refer to natural hazards. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

841.5 – OPPOSE

This part of the submission proposes removing overlays and qualifying matters that “inappropriately restrict the implementation of the NPS UD and RMA Enabling Act”. The submission does not define which overlays and qualifying matters they consider “inappropriate”, so we assume this could refer to natural hazards. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

841.7 – OPPOSE

This part of the submission proposes deleting natural hazards as qualifying matters in the Unitary Plan. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

841.8 – OPPOSE

This part of the submission proposes deleting the part of the background to the Natural Hazards chapter introducing natural hazards as qualifying matters in the Unitary Plan. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

841.10 – OPPOSE

This part of the submission proposes that down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in

the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

841.51 – OPPOSE

This part of the submission proposes that down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

841.113 – OPPOSE

This part of the submission proposes removing the introduction of qualifying matters into zones in the Unitary Plan. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

841.114 – OPPOSE

This part of the submission proposes removing the introduction of qualifying matters into the Unitary Plan. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

841.115 – OPPOSE

This part of the submission proposes that the Residential – Low Density zone is deleted entirely. Areas currently zoned as Residential – Low Density include parts of suburbs which are at risk from natural hazards. In particular, the Residential - Low Density zone incorporates some of those properties which are within the Coastal Erosion and Coastal Inundation hazard overlays, and some properties at particular risk of flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding being rezoned as Residential – Low Density, in order to limit the exposure of residents and their property to natural hazards.

I seek that the parts of the original submission outlined above be disallowed

I support : **Oppose** (tick one) **the submission of:**

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

Piper Properties Consultants Limited

Tom.Morgan@Tattico.co.nz and
layne@bastiongroup.co.nz

949	2
	4
	33
	34
	105
	106
	144
	145
	148
	149
	155
	158

The reasons for my support / opposition are:

949.2 – OPPOSE

This part of the submission proposes removing “unjustified” qualifying matters in the Unitary Plan. The submission does not define which qualifying matters they consider “unjustified”, so we assume this could refer to natural hazards. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

949.4 - OPPOSE

This part of the submission proposes removing overlays and qualifying matters that “inappropriately restrict the implementation of the NPS UD and RMA Enabling Act”. The submission does not define which overlays and qualifying matters they consider “inappropriate”, so we assume this could refer to natural hazards. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

949.33 – OPPOSE

This part of the submission proposes deleting natural hazards as qualifying matters in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

949.34 – OPPOSE

This part of the submission proposes deleting the part of the background to the Natural Hazards chapter introducing natural hazards as qualifying matters in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

949.105 – OPPOSE

This part of the submission proposes that the Residential – Terraced Housing and Apartment Buildings is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas which are located close to

centers and transport options. Areas close to centers and transport options which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

949.106 – OPPOSE

This part of the submission proposes that down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards

949.144 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas close to centers and transport options which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

949.145 – OPPOSE

This part of the submission proposes that the Residential – Terraced Housing and Apartment Buildings is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

949.149 – OPPOSE

This part of the submission proposes removing the introduction of qualifying matters into the Unitary Plan and extending higher intensity zones into areas currently mapped as qualifying matters. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

949.155 – OPPOSE

This part of the submission proposes that flood hazard mapping is deleted from the Auckland Unitary Plan. Floods are one of the most frequent hazards faced in Aotearoa and can have serious effects on wellbeing if flooding events are severe or repeated. Controlling development via flooding overlays is consistent with other applications of natural hazard qualifying matters and accurate and risk-based regulatory hazard maps are an important tool to limit subdivision and development within areas subject to flooding risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk. As per our original submission, Toka Tū Ake EQC requests that areas of higher flooding hazard risk, i.e. stream corridors, overland flowpaths and ponding areas, are included within the regulatory

maps in the district plans..

949.158 – OPPOSE

This part of the submission proposes removing the introduction of qualifying matters into the Unitary Plan and extending higher intensity zones into areas currently mapped as qualifying matters. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

I seek that the parts of the original submission outlined above be disallowed

I support : **Oppose** (tick one) **the submission of:**
 (Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number **Point-Number**

Avant Group Limited ('Avant') and Ngā Maunga Whakahii
 o Kaipara Whenua Hoko Holdings Limited ('NMWoK')
 mark.vinall@tattico.co.nz

1066	54
	58
	109

The reasons for my support / opposition are:

1066.54 – OPPOSE

This part of the submission proposes that the Residential – Low Density zone is deleted entirely. Areas currently zoned as Residential – Low Density include parts of suburbs which are at risk from natural hazards. In particular, the Residential - Low Density zone incorporates some of those properties which are within the Coastal Erosion and Coastal Inundation hazard overlays, and some properties at particular risk of flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding being rezoned as Residential – Low Density, in order to limit the exposure of residents and their property to natural hazards.

1066.58 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas close to centers and transport options which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1066.109 – OPPOSE

This part of the submission proposes that the Residential – Terraced Housing and Apartment Buildings is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

I seek that the parts of the original submission outlined above be disallowed

I support : **Oppose** (tick one) **the submission of:**

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

Fulton Hogan Land Development Limited

1073	12
	119

nickr@barker.co.nz

rebeccas@barker.co.nz

The reasons for my support / opposition are:

1073.12 – OPPOSE

This part of the submission proposes amending Objective H5.2(6) (Mixed Housing Urban zone) as follows - ~~'Development contributes to a high quality built environment that is resilient to the effects of climate change, and contributes to a reduction in carbon emissions.'~~ Toka Tū Ake EQC considers that while reducing carbon emissions is a key element in mitigating the impact of climate change, some degree of atmospheric warming is inevitable, and the climatic impacts are already being felt in Aotearoa. As such it is vital that the built environment in our cities is resilient to the increased risk from natural hazards that will likely occur because of those impacts, which include sea level rise leading to increased coastal erosion, coastal inundation and potential impacts of tsunamis, and increased rainfall in parts of the country, leading to more frequent and severe flooding and landslide events. To be resilient, our communities must adapt, which the original objective wording allows for.

1073.119 – OPPOSE

This part of the submission proposes amending Objective H6.2(5) (Terrace Housing and Apartment Buildings zone) as follows - ~~'Development contributes to a high quality built environment that is resilient to the effects of climate change, and contributes to a reduction in carbon emissions.'~~ Toka Tū Ake EQC considers that while reducing carbon emissions is a key element in mitigating the impact of climate change, some degree of atmospheric warming is inevitable, and the climatic impacts are already being felt in Aotearoa. As such it is vital that the built environment in our cities is resilient to the increased risk from natural hazards that will likely occur because of those impacts, which include sea level rise leading to increased coastal erosion, coastal inundation and potential impacts of tsunamis, and increased rainfall in parts of the country, leading to more frequent and severe flooding and landslide events. To be resilient, our communities must adapt, which the original objective wording allows for.

I seek that the parts of the original submission outlined above be disallowed

I support : Oppose (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

Oyster Capital

nickr@barker.co.nz
rebeccas@barker.co.nz

1074	9
	115

The reasons for my support / opposition are:

1074.9 – OPPOSE

This part of the submission proposes amending Objective H5.2(6) (Mixed Housing Urban zone) as follows - ~~'Development contributes to a high-quality built environment that is resilient to the effects of climate change, and contributes to a reduction in carbon emissions.'~~ Toka Tū Ake EQC considers that while reducing carbon emissions is a key element in mitigating the impact of climate change, some degree of atmospheric warming is likely, and the climatic impacts are already being felt in Aotearoa. As such it is vital that the built environment in our cities is resilient to the increased risk from natural hazards that will likely occur because of those impacts, which include sea level rise leading to increased coastal erosion, coastal inundation and potential impacts of tsunamis, and increased rainfall in parts of the country, leading to more frequent and severe flooding and landslide events. To be resilient, our communities must adapt, which the original objective wording allows for.

1074.115 – OPPOSE

This part of the submission proposes amending Objective H6.2(5) (Terrace Housing and Apartment Buildings zone) as follows - ~~'Development contributes to a high-quality built environment that is resilient to the effects of climate change, and contributes to a reduction in carbon emissions.'~~ Toka Tū Ake EQC considers that while reducing carbon emissions is a key element in mitigating the impact of climate change, some degree of atmospheric warming is likely, and the climatic impacts are already being felt in Aotearoa. As such it is vital that the built environment in our cities is resilient to the increased risk from natural hazards that will likely occur because of those impacts, which include sea level rise leading to increased coastal erosion, coastal inundation and potential impacts of tsunamis, and increased rainfall in parts of the country, leading to more frequent and severe flooding and landslide events. To be resilient, our communities must adapt, which the original objective wording allows for.

I seek that the parts of the original submission outlined above be disallow

I support : Oppose (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

Fletcher Residential Limited

1080

19

The reasons for my support / opposition are:

1080.19 – OPPOSE

This part of the submission proposes amending Objective H5.2(6) (Mixed Housing Urban zone) as follows - 'Development ~~contributes to a high quality built environment that is resilient to the effects of climate change and contributes to a reduction in carbon emissions.~~' Toka Tū Ake EQC considers that while reducing carbon emissions is a key element in mitigating the impact of climate change, some degree of atmospheric warming is likely, and the climatic impacts are already being felt in Aotearoa. As such it is vital that the built environment in our cities is resilient to the increased risk from natural hazards that will likely occur because of those impacts, which include sea level rise leading to increased coastal erosion, coastal inundation and potential impacts of tsunamis, and increased rainfall in parts of the country, leading to more frequent and severe flooding and landslide events. To be resilient, our communities must adapt, which the original objective wording allows for.

I seek that the parts of the original submission outlined above be disallowed

I support : Oppose (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

Sonn Group

Mark.Vinall@Tattico.co.nz

1086	2
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	81
	82
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The reasons for my support / opposition are:

1086.2 – OPPOSE

This part of the submission proposes removing “unjustified” qualifying matters in the Unitary Plan. The submission does not define which qualifying matters they consider “unjustified”, so we assume this could refer to natural hazards. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

1086.4 - OPPOSE

This part of the submission proposes removing overlays and QM that “inappropriately restrict the implementation of the NPS UD and RMA Enabling Act”. The submission does not define which overlays and qualifying matters they consider “inappropriate”, so we assume this could refer to natural hazards. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

1086.6 – OPPOSE

This part of the submission proposes deleting natural hazards as qualifying matters in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

1086.22 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1086.23 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1086.24 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1086.25 – OPPOSE

This part of the submission proposes that down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1086.22 – OPPOSE

This part of the submission proposes that the Residential – Terrace Housing and Apartment Buildings zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1086.23 – OPPOSE

This part of the submission proposes that the Residential – Terrace Housing and Apartment Buildings zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1086.24 – OPPOSE

This part of the submission proposes that the Residential – Terrace Housing and Apartment Buildings zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural

hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1086.25 – OPPOSE

This part of the submission proposes that down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

I seek that the parts of the original submission outlined above be disallowed

I support : Oppose (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

Winton Land Limited

ross.cooper@tattico.co.nz

1543	48
	49
	62
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	66
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	117
	211
	212

The reasons for my support / opposition are:

1543.48 – OPPOSE

This part of the submission proposes deleting natural hazards as qualifying matters in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

1548.49 – OPPOSE

This part of the submission proposes deleting the part of the background to the Natural Hazards chapter introducing natural hazards as qualifying matters in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, landslides, coastal inundation and flooding, which will likely become more severe in the near future due to the effect of climate change.

1548.62 – OPPOSE

This part of the submission proposes that the Residential – Low Density zone is deleted entirely. Areas currently zoned as Residential – Low Density include parts of suburbs which are at risk from natural hazards. In particular, the Residential - Low Density zone incorporates some of those properties which are within the Coastal Erosion and Coastal Inundation hazard overlays, and some properties at particular risk of flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding being rezoned as Residential – Low Density, in order to limit the exposure of residents and their property to natural hazards.

1548.65 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1548.66 – OPPOSE

This part of the submission proposes that down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower

density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1543.116 – OPPOSE

This part of the submission proposes that the Residential – Terraced Housing and Apartment Buildings is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1543.117 – OPPOSE

This part of the submission proposes that down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1543.211 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1543.212 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

I seek that the parts of the original submission outlined above be disallowed

I support : Oppose (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

Gibbonsco Management Limited

ross.cooper@tattico.co.nz

1585	4
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	52
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	73
	128
	129

The reasons for my support / opposition are:

1585.4 – OPPOSE

This part of the submission proposes removing council identified qualifying matters in the Unitary Plan. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

1585.6 – OPPOSE

This part of the submission proposes removing “unjustified” qualifying matters in the Unitary Plan. The submission does not define which qualifying matters they consider “unjustified”, so we assume this could refer to natural hazards. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

1585.7 - OPPOSE

This part of the submission proposes removing overlays and QM that “inappropriately restrict the implementation of the NPS UD and RMA Enabling Act”. The submission does not define which overlays and qualifying matters they consider “inappropriate”, so we assume this could refer to natural hazards. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

1585.51 – OPPOSE

This part of the submission proposes deleting natural hazards as qualifying matters in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

1585.52 – OPPOSE

This part of the submission proposes deleting the part of the background to the Natural Hazards chapter introducing natural hazards as qualifying matters in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not

allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

1585.67 – OPPOSE

This part of the submission proposes that the Residential – Low Density zone is deleted entirely. Areas currently zoned as Residential – Low Density include parts of suburbs which are at risk from natural hazards. In particular, the Residential - Low Density zone incorporates some of those properties which are within the Coastal Erosion and Coastal Inundation hazard overlays, and some properties at particular risk of flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding being rezoned as Residential – Low Density, in order to limit the exposure of residents and their property to natural hazards.

1585.70 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1585.71 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1585.72 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1585.73 – OPPOSE

This part of the submission proposes that down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk

of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1585.128 – OPPOSE

This part of the submission proposes that the Residential – Terraced Housing and Apartment Buildings is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

1585.129 – OPPOSE

This part of the submission proposes that down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

I seek that the parts of the original submission outlined above be disallowed

I support : Oppose (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

Aedifice Property Group

jessica@civix.co.nz

1962	13
	14
	16
	25

The reasons for my support / opposition are:

1962.13 – OPPOSE

This part of the submission proposes that Coastal Erosion is deleted as a qualifying matter from the Auckland Unitary Plan. Coastal erosion is a serious concern in Auckland and is likely to get worse with the impact of climate change and sea-level rise. Controlling development via qualifying matters and accurate and risk-based regulatory hazard maps are an important tool to limit subdivision and development within areas subject to erosion risk. Removing these qualifying matters and their overlays opens the possibility that rules controlling development in erosion-prone areas will be inconsistently applied, exposing people and their properties to unnecessary risk. As per our original submission, Toka Tū Ake EQC requests that properties within the coastal erosion hazard zone are all down-zoned to Residential – Low Density or Residential – Single House.

1962.14 – OPPOSE

This part of the submission proposes that Coastal Erosion is deleted as a qualifying matter from the Auckland Unitary Plan. Coastal inundation is a serious concern in Auckland and is likely to get worse with the impact of climate change and sea-level rise. Controlling development via qualifying matters and accurate and risk-based regulatory hazard maps are an important tool to limit subdivision and development within areas subject to inundation risk. Removing these qualifying matters and their overlays opens the possibility that rules controlling development in areas at risk from inundation will be inconsistently applied, exposing people and their properties to unnecessary risk. As per our original submission, Toka Tū Ake EQC requests that properties within the coastal inundation hazard zone are all down-zoned to Residential – Low Density or Residential – Single House.

1962.16 – OPPOSE

This part of the submission proposes that Flood Plains are deleted as a qualifying matter from the Auckland Unitary Plan. Floods are one of the most frequent hazards faced in Aotearoa and can have serious effects on wellbeing if flooding events are severe or repeated. Removing these qualifying matters and their overlays opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk. As per our original submission, Toka Tū Ake EQC requests that areas of higher flooding hazard risk, i.e., stream corridors and overland flow paths, are included within the regulatory maps in the district plans, and development within these areas is more restricted than that in ponding areas.

1962.25 – OPPOSE

This part of the submission proposes amending properties within urban areas that are subject to a spatially mapped qualifying matters to be within relevant residential environments, and rezone to Mixed Housing Urban or Terrace Housing and Apartment Buildings. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

I seek that the parts of the original submission outlined above be disallowed

I support : Oppose (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number



Classic Group

Michael@campbellbrown.co.nz

2033	9
	12

The reasons for my support / opposition are:

2033.12 – OPPOSE

This part of the submission proposes the rezoning of “all flood plains identified as Qualifying Matters that have been downzoned to a Low Density Residential Zone as a result of these to a zoning that is based on the most appropriate zone based on accepted land use principles”. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

I seek that the parts of the original submission outlined above be disallowed

I support : **Oppose** (tick one) **the submission of:** *(Please identify the specific parts of the original submission)*
(Original Submitters Name and Address) **Submission Number** **Point-Number**



Mike Greer Development

Michael@campbellbrown.co.nz

2040	9

The reasons for my support / opposition are:

2040.9 – OPPOSE

This part of the submission proposes the rezoning of “all flood plains identified as Qualifying Matters that have been downzoned to a Low Density Residential Zone as a result of these to a zoning that is based on the most appropriate zone based on accepted land use principles”. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

I seek that the parts of the original submission outlined above be disallowed

I support : **Oppose** (tick one) **the submission of:**

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

Neilston Homes

2041	9
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	152

The reasons for my support / opposition are:

2041.9 – OPPOSE

This part of the submission proposes the rezoning of “all (...) flood plains (...) identified as Qualifying Matters that have been downzoned to a Low Density Residential Zone as a result of these to a zoning that is based on the most appropriate zone based on accepted land use principles”. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2041.10 – OPPOSE

This part of the submission proposes the rezoning of “all (...) flood plains (...) identified as Qualifying Matters that have been downzoned to a Low Density Residential Zone as a result of these to a zoning that is based on the most appropriate zone based on accepted land use principles”. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2041.11 – OPPOSE

This part of the submission proposes the rezoning of “all (...) flood plains (...) identified as Qualifying Matters that have been downzoned to a Low Density Residential Zone as a result of these to a zoning that is based on the most appropriate zone based on accepted land use principles”. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2041.12 – OPPOSE

This part of the submission proposes the rezoning of “all (...) flood plains (...) identified as Qualifying Matters that have been downzoned to a Low Density Residential Zone as a result of these to a zoning that is based on the most appropriate zone based on accepted land use principles”. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2041.152 – OPPOSE

This part of the proposal requests that height limits in the Mixed Housing Urban Zone are increased to 24 m. Toka Tū Ake EQC opposes rezoning for higher density or increasing building height limits in areas which are at risk from natural

hazard, particularly those properties within the Coastal Erosion or Coastal Inundation Hazard zones, or in areas at risk from flooding hazards. Natural hazards, particularly coastal erosion and flooding, are already impacting suburbs of Auckland on a regular basis, and the risks from these will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change

I seek that the parts of the original submission outlined above be disallowed

I support : **Oppose** (tick one) **the submission of:**

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

Stuart P.C. Ltd

2248	81
	82
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The reasons for my support / opposition are:

2248.81 – OPPOSE

This part of the submission proposes that the Residential – Terraced Housing and Apartment Buildings is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2248.82 – OPPOSE

This part of the submission proposes that the Residential – Terraced Housing and Apartment Buildings is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2248.83 – OPPOSE

This part of the submission proposes that Qualifying Matters are removed and down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk, and we support the use of Qualifying Matters to limit intensification. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2248.84 – OPPOSE

This part of the submission proposes that Qualifying Matters are removed and down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk, and we support the use of Qualifying Matters to limit intensification. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2248.85 – OPPOSE

This part of the submission proposes that Qualifying Matters are removed and down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk, and we support the use of Qualifying Matters to limit intensification. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2248.86 – OPPOSE

This part of the submission proposes that Qualifying Matters are removed and down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk, and we support the use of Qualifying Matters to limit intensification. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2248.87 – OPPOSE

This part of the submission proposes that Qualifying Matters are removed and down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk, and we support the use of Qualifying Matters to limit intensification. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor, overland flow path or ponding area) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2248.125 – OPPOSE

This part of the submission rejects the Council's approach to the relationship between Qualifying Matters and underlying zoning in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

2248.126 – OPPOSE

This part of the submission rejects the Council's approach to the relationship between Qualifying Matters and underlying zoning in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

2248.127 – OPPOSE

This part of the submission proposes that Qualifying Matters are removed and down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed.

Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk, and we support the use of Qualifying Matters to limit intensification. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2248.128 – OPPOSE

This part of the submission proposes that Qualifying Matters are removed and down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk, and we support the use of Qualifying Matters to limit intensification. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2248.129 – OPPOSE

This part of the submission proposes that Qualifying Matters are removed and down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk, and we support the use of Qualifying Matters to limit intensification. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2248.130 – OPPOSE

This part of the submission proposes that Qualifying Matters are removed and down-zoning for natural hazards (i.e., zoning properties within areas at risk from natural hazards as lower density than required by the MDRS) is not allowed. Areas currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards, and small settlements which are at serious risk from coastal processes and flooding. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk, and we support the use of Qualifying Matters to limit intensification. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

I seek that the parts of the original submission outlined above be disallowed

I support : **Oppose** (tick one) **the submission of:** *(Please identify the specific parts of the original submission)*
(Original Submitters Name and Address) **Submission Number** **Point-Number**

CivilPlan Consultants Ltd

2272	10
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	13

The reasons for my support / opposition are:

2272.10 – OPPOSE

This part of the submission proposes that the Residential – Terraced Housing and Apartment Building zone within walkable catchments is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2272.11 – OPPOSE

This part of the submission proposes that the Residential – Terraced Housing and Apartment Buildings close to town and local centres is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2272.12 – OPPOSE

This part of the submission proposes that the Residential – Terraced Housing and Apartment Buildings zone is extended into Special Housing Area precincts within 400m of land zoned Business-Local Centre or Business-Town Centre regardless of any identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2272.13 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

I seek that the parts of the original submission outlined above be disallowed

I support : **Oppose** (tick one) **the submission of:** *(Please identify the specific parts of the original submission)*

(Original Submitters Name and Address)

Submission Number

Point-Number

Templeton Group

2303	2
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	198

The reasons for my support / opposition are:

2303.2 – OPPOSE

This part of the submission proposes removing “unjustified” qualifying matters in the Unitary Plan. The submission does not define which qualifying matters they consider “unjustified”, we assume this could refer to natural hazards. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

2303.4 – OPPOSE

This part of the submission proposes removing overlays and Qualifying Matters that “inappropriately restrict the implementation of the NPS UD and RMA Enabling Act”. The submission does not define which overlays and qualifying matters they consider “inappropriate”, so we assume this could refer to natural hazards. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

2303.8 – OPPOSE

This part of the submission proposes deleting natural hazards as qualifying matters in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

2303.9 – OPPOSE

This part of the submission proposes deleting the part of the background to the Natural Hazards chapter introducing natural hazards as qualifying matters in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

2303.190 – OPPOSE

This part of the submission rejects the Council's approach to the relationship between Qualifying Matters and underlying zoning in the Unitary Plan. Urban development and intensification are important for the sustainability and livability of urban areas in Aotearoa. However, it is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

2303.191 – OPPOSE

This part of the submission proposes removing council identified qualifying matters in the Unitary Plan. It is key that intensification is targeted and is not allowed in areas which are at risk from natural hazards. Toka Tū Ake EQC supports

the use of natural hazards as qualifying matters to limit application of the MDRS and NPS-UD. Intensification and development in areas at risk from natural hazards would put more people and their properties at risk from hazards common to the Auckland region, in particular coastal erosion, coastal inundation, landslides and flooding, which will likely become more severe in the near future due to the effect of climate change.

2303.195 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2303.196 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2303.197 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

2303.198 – OPPOSE

This part of the submission proposes that the Residential – Mixed Housing Urban zone is extended into areas within the flood plain hazard overlay and any other identified qualifying matter areas. Areas which are currently zoned as lower density than required by the MDRS include parts of suburbs which are at risk from natural hazards. The risk of these hazards will likely increase in the near future with sea level rise, increased rainfall and other effects of climate change. As such, Toka Tū Ake EQC do not consider it appropriate to blanket apply MDRS intensification to these areas without consideration of natural hazard risk. We support selective zoning for intensification in areas at least risk from natural hazards at present and in the future. As per our original submission, we support all properties within coastal hazard zones and areas at high risk of flooding (i.e., being within a stream corridor or overland flow path) being rezoned as Residential – Low Density or Residential – Single House, in order to limit the exposure of residents and their property to natural hazards.

I seek that the parts of the original submission outlined above be disallowed

I do not wish to be heard in support of my submission
If others make a similar submission, I will not consider presenting a joint case
with them at a hearing



18/01/2023

Signature of Further Submitter
(or person authorised to sign on behalf of further submitter)

Date

PLEASE COMPLETE THE FOLLOWING SECTION

Please tick one

I am a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category)

I am a person who has an interest in the proposal that is greater than the interest that the general public has. (Specify on what grounds you come within this category)

Toka Tū Ake EQC is a Crown Entity responsible for providing insurance to residential property owners against the impact of natural hazards. We also invest in and facilitate research and education about natural hazards, and methods of reducing or preventing natural hazard damage. The contingent liability associated with natural hazard risk in New Zealand is high and is carried, in large part, by Toka Tū Ake EQC on behalf of the Crown. Toka Tū Ake EQC therefore has a strong interest in reducing risk from, and building resilience to, natural hazards in New Zealand.

Notes to person making submission:

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority

If you are making a submission to the Environmental Protection Authority, you should use Form 16C.

